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*Attorneys for the Debtors and  
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California  
corporation, *et al.*,<sup>1</sup>

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**DEBTORS' RESERVATION OF  
RIGHTS REGARDING INTERDEBTOR  
CLAIMS AND INTERESTS**

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

Lefever Mattson, a California corporation (“LeFever Mattson”), and its affiliated debtors and debtors in possession (the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), respectfully submit this reservation of rights with respect to the Bar Date and the Interdebtor Claims and Interests (both defined below) in the Chapter 11 Cases.

The Debtors filed their schedules of assets and liabilities, statements of financial affairs, and lists of equity security holders for all 61 Chapter 11 Cases on November 15, 2024 [Dkt. Nos. 292–353].<sup>2</sup> On November 22, 2024, the Debtors and the Official Committee of Unsecured Creditors appointed in these Chapter 11 Cases (the “Committee”) filed the *Joint Motion for an Order (1) Establishing Bar Date; (2) Approving Form and Manner of Notice of Bar Date and Procedures with Respect Thereto; and (3) Approving Confidentiality Protocols* [Dkt. No. 366] (the “Bar Date Motion”).<sup>3</sup> In addition to seeking the Court’s approval of a deadline for (i) Investors to file proofs of interest on account of their investments in the Debtors and (ii) Creditors to file proofs of claim on account of their claims against the Debtors (the “Bar Date”), the Bar Date Motion identified certain parties who are “not required to file proofs of claim on or before the Bar Date in these Chapter 11 Cases,” including “any Debtor holding a Claim against another Debtor.” Bar Date Mot. 10-11 (emphasis in original).

On December 13, 2024, the Court entered the *Order (1) Establishing Bar Date; (2) Approving Form and Manner of Notice of Bar Date and Procedures with Respect Thereto; and (3) Approving Confidentiality Protocols* [Dkt. No. 459] (the “Bar Date Order”). The Bar Date Order granted the Bar Date Motion and fixed February 14, 2025, at 11:59 p.m. (Pacific Time) as the Bar Date.

Consistent with the Bar Date Motion and the Bar Date Order, the Debtors do not plan to file by the Bar Date any proofs of interest or proofs of claim on account of any interest or claim held by one Debtor in or against another Debtor (the “Interdebtor Claims and Interests”). The

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<sup>2</sup> “A voluntary petition, list, schedule, or statement may be amended by the debtor as a matter of course at any time before the case is closed.” Fed. R. Bankr. P. 1009.

<sup>3</sup> Capitalized terms used but not defined herein shall have the meanings given to them in the Bar Date Motion or the Bar Date Order (defined below).

1 investigations of the Debtors and the Committee into the Debtors' prepetition transactions, assets,  
2 and claims are ongoing, and the Debtors and the Committee expect to receive material information  
3 through the Proof of Interest and/or Proof of Claim Forms and supporting documentation that are  
4 filed pursuant to the Bar Date Order. The Debtors hereby reserve all rights with respect to the  
5 Interdebtor Claims and Interests.

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7 Dated: February 14, 2025

**KELLER BENVENUTTI KIM LLP**

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9 By: /s/ Thomas B. Rupp

10 Thomas B. Rupp

11 *Attorneys for the Debtors and Debtors in*  
12 *Possession*  
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